

ALVERSON TAYLOR & SANDERS
KURT R. BONDS, ESQ.
Nevada Bar #6228
MADISON M. AGUIRRE, ESQ.
Nevada Bar #16183
TANYA M. FRASER, ESQ.
Nevada Bar #13872
6605 Grand Montecito Parkway
Suite 200
Las Vegas, Nevada 89149
(702) 384-7000
efile@alversontaylor.com
Attorneys for Defendants

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

SCOTT GIRARD CRUMP,

Plaintiff,

vs.

WALMART, INC., a Foreign Corporation; DOE STORE MANAGERS I through X; DOE STORE EMPLOYEES I through X; DOE OWNERS I through X; DOE PROPERTY MANAGERS I through X; DOE MAINTENANCE EMPLOYEES I through X; DOE JANITORIAL EMPLOYEES I through X; ROE PROPERTY MANAGERS XI through XX; ROE MAINTENANCE COMPANIES XI through XX; ROE OWNERS XI through XX; ROE EMPLOYERS XI through XX; DOES XXI through XXV; and ROE CORPORATIONS, XXV through XXX, inclusive, jointly and severally.

Defendants.

Case No.: 2:22-cv-02005-CDS-EJY

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
DEADLINES**

[First Request]

Plaintiff SCOTT GIRARD CRUMP (“Plaintiff”) and Defendant WALMART, INC. (“Defendant”), by and through their respective counsel of record, do hereby stipulate to extend the remaining deadlines in the current scheduling order and discovery plan in this matter for a period of ninety (90) days.

1 Pursuant to Local Rule 6-1(b), the parties hereby aver that this is their first request to extend
 2 discovery deadlines in this matter.

3 **DISCOVERY COMPLETED TO DATE**

- 4
- 5 • The parties submitted their Joint Status Report on December 30, 2022.
 - 6 • Plaintiff served his Initial Disclosure Statement Pursuant to FRCP 26(a)(1) and Initial
Expert Disclosures on January 18, 2023.
 - 7 • Defendant served its FRCP 26 Disclosure of Witness Statements and Documents on
March 3, 2023.
 - 8 • The parties conducted an FRCP 26(f) conference on March 6, 2023.
 - 9 • Plaintiff conducted a Site Inspection at Defendant Walmart's premises on May 3, 2023.
 - 10 • Defendant served its First Set of Interrogatories, Requests for Admissions, and Requests
for Production of Documents on Plaintiff on May 25, 2023.

11 **DISCOVERY TO BE COMPLETED**

- 12
- 13 • Plaintiff's responses to Defendant Walmart's First Set of Interrogatories, Requests for
Admissions, and Requests for Production of Documents.
 - 14 • Additional written discovery between the parties.
 - 15 • Deposition of Plaintiff.
 - 16 • Deposition of Defendant Walmart.
 - 17 • Depositions of the parties' witnesses.
 - 18 • Depositions of Plaintiff's treating physicians.
 - 19 • Expert discovery, including depositions.

20 **REASONS FOR THE PARTIES' REQUEST TO EXTEND**

21 Consistent with the requirements of LR 26-3, good cause exists for this Court to grant the
 22 parties' requested 90-day extension of deadlines as the parties are currently negotiating settlement
 23 and wish to focus their time and financial resources on early resolution. This extension also
 24 potentially avoids waste of the Court's resources, should Plaintiff's claims resolve. Moreover, the
 25 deadline for initial expert disclosures is currently July 6, 2023, which is more than 21 days after the
 26 date of submission of the instant Stipulation; accordingly, the parties' request is not untimely under
 27
 28

1 LR 26-3. The parties make this request in good faith and have no intent to delay resolution of this
 2 matter.

3 **PROPOSED DISCOVERY DEADLINES**

4 <u>Event</u>	5 <u>Date</u>
6 Amend Pleadings or Add Parties	7 June 6, 2023
8 Expert Disclosures	9 October 4, 2023
10 Rebuttal Expert Disclosures	11 November 3, 2023
12 Discovery Cut-Off	13 December 4, 2023
14 Dispositive Motions	15 January 2, 2024
16 Joint Pre-Trial Order	17 February 1, 2024

18 IT IS SO STIPULATED.

19 DATED this 13th day of June, 2023

20 DATED this 13th day of June, 2023

21 ALVERSON TAYLOR & SANDERS

22 BIGHORN LAW

23 */s/ Tanya M. Fraser*

24 KURT R. BONDS, ESQ.

25 Nevada Bar #6228

26 MADISON M. AGUIRRE, ESQ.

27 Nevada Bar # 16183

28 TANYA M. FRASER, ESQ.

Attorneys for Defendants

29 */s/ Gregory S. Caruso*

30 GREGORY S. CARUSO, ESQ.

31 Nevada State Bar No. 13086

32 3675 W. Cheyenne Ave.

33 Suite 100

34 North Las Vegas, NV 89032

35 Telephone: 702 333 1111

36 Gregory@Bighornlaw.com

37 jennifer.miller@bighornlaw.com

38 nicholas@bighornlaw.com

39 Attorneys for Plaintiff

40 IT IS SO ORDERED:

41 
 42 Clayton J. Zouchal
 43 UNITED STATES MAGISTRATE JUDGE

44 Dated: June 13, 2023